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APPLICATION GRANTED
SO ORDERED



John G. Koeltl, U.S.D.J.

The Honorable John G. Koeltl
United States District Judge
United States Courthouse, Courtroom 12B
500 Pearl Street
New York, New York 10007-1312

9/4/14

September 3, 2014

USDC SDNY
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Re: All Underwriters at Lloyd's vs. R.G. Oceans, Inc., 14-cv-02150-JGK

Dear Judge Koeltl,

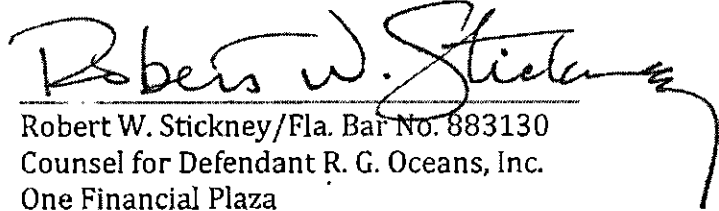
I represent defendant R.G. Oceans, Inc., hereinafter R. G. Oceans, in the above referenced maritime insurance dispute. Counsel respectfully submits this letter motion to request an additional 30 day extension of time to respond to the instant Complaint. The original response date was August 12, 2014. On August 8, 2014 this Honorable Court granted a 21 day extension and set September 2, 2014 as the due date for defendant R. G. Oceans to respond to the Complaint. ECF Nos. 12, 13. If granted, defendant R. G. Oceans' response would be due on October 2, 2014. Plaintiff's counsel does not oppose defendant's motion for a 30 day extension. This extension does not affect any other scheduled dates.

Defendant R. G. Oceans is a Delaware corporation yet its principal resides in Mexico. On behalf of defendant R. G. Oceans, counsel has endeavored to identify conflict free counsel experienced in maritime law who are admitted to practice in the Southern District of New York. To that end, counsel travelled to New York City from August 26, 2014 through August 29, 2014 and met with several extremely well qualified maritime lawyers, some of which were unable to represent R. G. Oceans due to client conflicts. Counsel believes that defendant R.G. Oceans will retain maritime counsel in the near future, probably within seven days. Whomever defendant R. G. Oceans retains will need sufficient time to familiarize themselves with the complex facts of this case and the applicable law before filing a response to the instant Complaint.

I am prepared to submit a proposed Order for this Honorable Court's consideration. However, counsel would be grateful if the Court would consider endorsing this letter

motion.¹ Based on the foregoing, counsel respectfully requests that this Honorable Court grant an additional 30 day extension through October 2, 2014.

Respectfully submitted,

A handwritten signature in black ink, reading "Robert W. Stickney", with a long, sweeping horizontal line extending to the right.

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Copy to:
Plaintiff's counsel via email and CM/ECF

¹ Counsel's *pro hac vice* motion is pending before this Honorable Court.